



County of San Diego

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Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183

Date: September 1, 2016
Project Title: Simpson Farms Tentative Map
Record ID: PDS2005-3100-5460 (TM), LOG NO. PDS2005-3910-05-19-023 (ER)
Plan Area: Jamul-Dulzura Plan Area
GP Designation: Semi-Rural (SR-1, SR-2) and Rural Commercial (C-4)
Density: SR-1 = 1 unit per gross acre; SR-2 = 0.5 unit per gross acre; RC = N/A
Zoning: A70 and C36
Min. Lot Size: 1 acre/2 acre (residential); 0.9 acre (commercial)
Special Area Reg.: N/A
Lot Size: 156.7 acres
Applicant: Gotham Management, LLC, c/o Chad Harris (619)814-5716
Staff Contact: Marisa Smith - (858) 694-2621
marisa.smith@sdcounty.ca.gov

Project Description

The project is a major subdivision to divide a 156.7-acre property into 95 residential lots and one commercial lot (Lot 99). It should be noted that in addition to the residential and commercial lots, two lots are designated as biological open space (Lot 97 and 98), seven for roads (Lot 100-106), and one lot exclusively as a drainage basin (Lot 7). There are several other drainage basins within the site, but only Lot 7 has its own separate Lot. The site is currently split-zoned for both residential and commercial. While the proposed subdivision would create a parcel for the commercial property, commercial development is not a part of this application. The commercially zoned property would require the approval of a Major Use Permit prior to development. The site is located on the northeast corner of Campo Road (State Route 94) and Jefferson Road, in the Jamul-Dulzura Plan Area. Roads border the subdivision to the north (Olive Vista Drive), west (Jefferson Road), and southwest (Campo Road/State Route 94). Access to lots would be via several proposed private roads which eventually connect to both Jefferson Road and Olive Vista Drive. Water would be provided by Otay Water District and each lot would have a private septic system using an advance treatment system. Earthwork will consist of 180,000 cubic yards of balanced cut and fill.

The residentially zoned portion of the site is subject to the Semi-Rural General Plan Regional Category, Land Use Designation Semi-Rural. The commercially zoned portion of the site is subject to the Rural Commercial General Plan. Zoning for the residential portion is Limited Agricultural (A70) and General

Commercial (C36) for the commercial portion. The project is consistent with both density and lot size requirements of the General Plan and Zoning Ordinance.

Overview

California Public Resources Code section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent, (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

General Plan Update Program EIR

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

The GPU EIR was certified in conjunction with adoption of the GPU on August 3, 2011. The GPU EIR comprehensively evaluated environmental impacts that would result from Plan implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

Summary of Findings

The Simpson Farms Tentative Map (PDS2006-3100-5460) is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the proposed project, identified applicable mitigation measures necessary to reduce project specific impacts, and the project implements these mitigation measures

[http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00 -
_Mitigation Measures 2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures.

A comprehensive environmental evaluation has been completed for the project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

In accordance with CEQA Guidelines §15183, the project qualifies for an exemption because the following findings can be made:

1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.

The project would subdivide a 156.7-acre property into 106 lots (95 residential, one commercial, two open space, seven roads, and one stand-alone detention basin), which is consistent with the Semi-Rural development density established by the General Plan and the certified GPU EIR.

2. There are no project specific effects which are peculiar to the project or its site, and which the GPU EIR Failed to analyze as significant effects.

The subject property is no different than other properties in the surrounding area, and there are no project specific effects which are peculiar to the project or its site. The site is located in an area developed with similarly sized residential lots with associated accessory uses. In addition, the proposed supplemental treatment systems, in lieu of a traditional septic system, are not considered peculiar, as this design has been implemented for other residential projects within The County of San Diego. The property does not support any peculiar environmental features, and the project would not result in any peculiar effect.

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to Biology, Agriculture and Cultural resources. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this project.

3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.

The proposed project is consistent with the density and use characteristics of the development considered by the GPU EIR and would represent a small part of the growth that was forecast for build-out of the General Plan. The GPU EIR considered the incremental impacts of the proposed project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

As explained in the 15183 exemption checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

5. The project will undertake feasible mitigation measures specified in the GPU EIR.

As explained in the 15183 exemption checklist below, the project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through project design, compliance with regulations and ordinances, or through the project's conditions of approval.

Signature	<u>September 1, 2016</u> Date
<u>Marisa Smith</u> Printed Name	<u>Project Manager</u> Title

CEQA Guidelines §15183 Exemption Checklist

Overview

This checklist provides an analysis of potential environmental impacts resulting from the proposed project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the project would result in a potentially significant impact triggering additional review under Guidelines section 15183.

- Items checked “Significant Project Impact” indicates that the project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.
- Items checked “Impact not identified by GPU EIR” indicates the project would result in a project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.
- Items checked “Substantial New Information” indicates that there is new information which leads to a determination that a project impact is more severe than what had been anticipated by the GPU EIR.

A project does not qualify for a §15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of staff’s analysis of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and technical studies used to support the analysis is attached in Appendix A. Appendix B contains a list of GPU EIR mitigation measures.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
1. AESTHETICS – Would the Project:			
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 1(a) The project would be visible from public roads and trails, and the site is located within a viewshed of a scenic vista. However, the applicant has implemented design features such as additional landscaping, muted colors, fencing and orientation of the homes to allow buffering and screening between the project and all public roads and trails. These design features help the project blend in with the surrounding landscape, which has existing established homes.
- 1(b) The property is within the viewshed of a County or state scenic highway (State Route 94). However, the project site does not support any significant scenic resources that would be lost or modified through development of the property.
- 1(c) The project would be consistent with existing community character. The project is located in an area characterized by residential and light commercial uses. The addition of 95 new residential lots over 156.7 acres would not substantially degrade the visual quality of the site or its surroundings.
- 1(d) Residential lighting would be required to conform with the County's Light Pollution Code to prevent spillover onto adjacent properties and minimize impacts to dark skies.

Conclusion

As discussed above, the project would not result in any significant impacts to aesthetics; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
2. Agriculture/Forestry Resources – Would the Project:			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| b) Conflict with existing zoning for agricultural use, or a Williamson Act contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

- 2(a) The site contains farmland of local importance, grazing land and also contains candidate soils for prime farmland and farmland of statewide significance. In addition, the property has a history of agricultural use. Due to the presence of onsite agricultural resources, an Agricultural Resources Report dated September 2015 was completed by Dennis Marcin of Helix Environmental Planning, Inc. to determine the importance of the resource based on the County's Local Agricultural Resources Assessment (LARA model which takes into account local factors that define the importance of San Diego County agricultural resources). The LARA model considers the availability of water resources, climate, soil quality, surrounding land use, topography, and land use or parcel size consistency between the project site and surrounding land uses. A more detailed discussion of the LARA model can be found in the Guidelines for Determining Significance for Agricultural Resources at <http://www.sdcounty.ca.gov/pds/docs/AG-Guidelines.pdf>.

Based on the results of this LARA Model, it was determined that the project is an important agricultural resource because the site received a high rating for climate, water, surrounding land use, land use consistency, and topography and soil quality received a moderate score. Based on Section 1.4.2 and 2.2 of the Agricultural Resources Report, the project site includes approximately 89.3 acres of agricultural resources. Project-related impacts to on-site agriculture resources that occur within areas of prime farmland or farmland of statewide importance candidate soils encompass approximately 50.3 acres. The remaining, approximately 39 acres of identified on-site agricultural resources would either not be directly impacted by the project, and/or do not encompass prime farmland or farmland of statewide importance candidate soils. The 50.3 acres of impacts include areas proposed to be placed within a road, in the location of proposed structures or paving/grading, and within proposed residential structure pads (including areas within 15 feet of front and side yards of residences and within 30 feet from the rear yard of residences).

In addition to on-site conversion of farmland to a non-agricultural use, proposed off-site facilities including drainage improvements located west of Lot number 97 and Jefferson Road, roadway improvements along Jefferson Road, and connections along Jefferson

Road and Olive Vista Drive. The off-site drainage improvements include an impact area of approximately 0.1 acre within candidate soils. The project would require mitigation for this impact at a ratio of 1:1. Because all other off-site improvements and connections would be contained within existing right of way boundaries, no other associated impacts on off-site agricultural resources would result.

In order to mitigate for impacts to agricultural resources, as defined by the Agricultural Resource Guidelines for Determining Significance, mitigation shall be acquired at a 1:1 ratio. The project will be conditioned to mitigate for 50.4 acres of direct impacts through the County of San Diego's Purchase of Agricultural Conservation Easement (PACE) program prior to recordation of a Parcel Map or issuance of any permit (whichever occurs first) per Condition AG#1 below. This condition is consistent with Mitigation measure Agr-1.4 from the GPU EIR. Direct impacts to Agricultural Resources are less than significant with mitigation incorporated.

AG#1 – AGRICULTURAL PRESERVATION – PACE MITIGATION [PDS, FEE X 2]

INTENT: In order to mitigate for impacts to agricultural resources, as defined by the Agricultural Resource Guidelines for Determining Significance, mitigation shall be acquired at a 1:1 ratio. **DESCRIPTION OF REQUIREMENT:** The applicant shall acquire Purchase of Agricultural Conservation Easement (PACE) mitigation credits from the County of San Diego, or provide for the conservation of 50.4 acres of agricultural resources, as defined by the Agricultural Resource Guidelines for Determining Significance, as indicated below:

- a. The applicant shall purchase 50.4 PACE mitigation credits from the County of San Diego, through the payment of in lieu fees to the PACE Program mitigation bank, evidence of the purchase shall include the following information:
 1. A cashier's receipt of the in lieu fee payment, referencing the project name and numbers, total fee payment amount and the represented amount of acreage mitigated for by the payment. One mitigation credit from the PACE Program would equate to one acre of land permanently protected with an agricultural conservation easement within the PACE Program mitigation bank.
 2. An accounting of the status of the County of San Diego PACE Program mitigation bank, which can be obtained from the PACE Program Manager Bulmaro Canseco. This shall include the total amount of credits available at the bank, the amount required by this project, and the amount remaining after utilization by this project (at time of in lieu fee payment).

DOCUMENTATION: The applicant shall purchase the off-site mitigation through the PACE Program, as described in this condition and provide the evidence to the [PDS, PCC] for review and approval. **TIMING:** Prior to approval of any plan or issuance of any permit, and prior to use of the premises in reliance of this permit. **MONITORING:** The [PDS, PCC] shall review the documents provided for the satisfaction of this condition.

- 2(b) The project site is zoned A70 (Limited Agriculture) and C36 (General Commercial). The A70 zone is considered to be an agricultural zone. However, the proposed project will not result in a conflict in zoning for agricultural use, because single-family residential is a permitted use in RR zone and will not create a conflict with existing zoning for agricultural use. Additionally, the project site's land is not under a Williamson Act

Contract. Therefore, there will be no conflict with existing zoning for agricultural use, or a Williamson Act contract.

- 2(c) There are no timberland production zones on or near the property.
- 2(d) The project site is not located near any forest lands.
- 2(e) The project site and surrounding area within radius of one quarter mile contains grazing land, farmland of statewide importance and unique farmland. In addition, there are several agricultural uses nearby. As a result, an Agricultural Resources Report dated September 2015 was completed by Dennis Marcin of Helix Environmental Planning, Inc. As mentioned under answer 2(a) above, the project would require purchase of 50.4 PACE mitigation credits from the County of San Diego, through the payment of in lieu fees to the PACE Program mitigation bank for direct impacts. The project has also been reviewed and determined not to have any other significant adverse impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance or other changes that would result in conversion of an active agricultural operations to a non-agricultural use for the following reasons:
1. Olive orchards are located in areas near the project site to the east and west. It is not anticipated that this development would interfere with the operation of the olive orchards because olive orchards typically do not entail substantial noise, dust or vector generation and usually do not require extensive use of pesticides. In addition, there are other existing residential and other uses in close proximity to the properties containing olive orchards.
 2. The project proposes one-acre lots along the western boundary and two acre lots along the eastern boundary. These lot sizes and density is consistent with the surrounding area abutting the existing agricultural uses and existing zoning for the property.
 3. A 100-foot brush management zone is proposed along the eastern boundary as shown on the Tentative Map. This will provide an additional buffer from off-site agricultural uses and require residences to be set back at least 100 feet from the eastern boundary.
 4. The proposed landscape plan would provide screening and create a buffer between on-site residential lots and off-site uses, including the existing olive orchards.
 5. The proposed project would not be anticipated to result in potential conflicts with nearby orchards, such as trespassing, theft, and vandalism because the existing orchards contain perimeter chain-link fencing and "No Trespassing" signs.
 6. The project will comply with all applicable stormwater requirements and septic requirements to minimize any potential drainage and water quality effects to surrounding areas and uses.
 7. Except for the olive orchards, other agricultural uses in the area are separated from the project by other properties and/or existing residential uses.
 8. There are no existing agricultural preserves or Williamson act contacts that abut the property, creating a buffer and large setback.

9. Other agricultural uses (other than the olive orchards mentioned above) in the project vicinity are very minor in extent and are separated from the project by 330-700 feet.
10. The property is bordered by Highway 94 to the south, Jefferson Road to the west and Olive Vista Drive to the north. These roads create buffers and would distance the proposed development from off-site uses.
11. The project does not propose a school, day care or other use that involves a concentration of people at certain times within one mile of an agricultural operation or land under contract

Based on these factors, no potentially significant project conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use will occur as a result of this project.

Conclusion

As discussed above, the project would not result in any significant impacts to agricultural resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
3. Air Quality – Would the Project:			
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 3(a) The project proposes development that was anticipated and considered by SANDAG growth projections used in development of the RAQS and SIP. As such, the project would not conflict with either the RAQS or the SIP. In addition, the operational emissions from the project are below screening levels, and will not violate any ambient air quality standards.

- 3(b) The proposed project would consist of 95 single family homes, a neighborhood commercial site consisting of a 25,000 square foot (sf) grocery store and 95,000 sf of commercial retail. Additional land uses would include open space, access roads, and drainage facilities. Development would occur in two phases. For further details regarding construction phasing and project operation refer to the Air Quality Analysis Report, on file with Public Notice of LOG NO. PDS2005-3910-05-19-023 (ER)

Project development would result in construction and operational-related emissions. Construction emissions would include exhaust and fugitive dust emissions. Fugitive dust emissions would result from grading and earth movement as well from vehicle movement on unpaved surfaces. Exhaust emissions would result from the use of off-road construction equipment as well as worker commute vehicles and vendor haul trucks.

As described in the Air Quality Analysis Report and included as conditions of approval for the proposed project, grading operations associated with the construction of the project would be subject to the San Diego Air Pollution Control District's (SDAPCD) Rule 55-Fugitive Dust Control, which require the implementation of dust control measures such as the application of water to graded/exposed surfaces and during loading/unloading activities, wheel-washing or other means to minimize track out dust on vehicles entering/leaving the project site, stabilization of dirt piles, and hydroseeding of graded areas to minimize dust emissions from exposed surfaces. Further, all off-road construction equipment would use U.S. Environmental Protection Agency (EPA) approved Tier 2 or 3 engines and would be equipped with CARB-approved diesel particulate filters. Higher tier engines reduce emissions of NOx and diesel particulate filters reduce diesel exhaust emissions. With incorporation of all construction-related emission reduction measures, construction-related emissions would not exceed applicable San Diego County thresholds of significance. Refer to the Air Quality Analysis Report for further details.

In addition, the project would result in operational vehicle trips and associated exhaust emissions as well as area-wide emissions associated with re-application of architectural coatings and the use of consumer products containing volatile organic compounds (VOC). However, as conditions of approval for the proposed development, low-VOC containing coatings would be used on all building applications and no wood burning stoves or fireplaces would be included in the development. In addition, design considerations will be made to accommodate the installation of residential electrical vehicle (EV) charging stations. These measures would reduce area-wide emissions of VOCs as well as mobile-related emissions of VOC, NOX and PM. With incorporation of all operational emission reduction measures, operational-related emissions would not exceed applicable San Diego County thresholds of significance. Refer to the Air Quality Analysis Report for further details.

- 3(c) The project would contribute PM10, PM2.5, NOx, and VOC emissions from construction/grading and operational activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b above)). Further, as described above, construction equipment would be equipped with U.S. EPA Tier 2/3 engines and diesel particulate filters, further reducing exhaust emissions. Measures, as described above, would be in place to reduce area-wide and mobile-source emissions associated with land use development.

- 3(d) The proposed project would develop 95 single-family residential units and commercial land uses but would not include any of the types of uses that have been identified as sources of air pollution by the California Air Resources Board (CARB). In addition, the Project would not place sensitive receptors within the CARB siting distances of the listed air pollutant sources. Furthermore, project emissions of PM10 and PM2.5 during operation would be below screening level thresholds. Similarly, the project does not propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and will not place sensitive receptors near any carbon monoxide hotspots. For further details and analysis see Air Quality Analysis Report.
- 3(e) The project could produce objectionable odors during construction but would not result in any permanent odor sources associated with operations. Odorous emissions disperse rapidly with increasing distance from the source and due to the temporary nature of construction activities, emissions would cease once construction is complete. Therefore, construction related odors would not result in a new odor source that could adversely affect a substantial number of individuals. The Project would not place sensitive receptors within a close proximity to known odor sources. In addition, the development would not be a source of odors, as the proposed land uses are not generally associated with odors. Impacts associated with odor sources are considered less than significant.

Conclusion

As discussed above, the project would not result in any significant impacts to air quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
4. Biological Resources – Would the Project:			
Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

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e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

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Discussion

4(a) Biological resources on the project site were evaluated in a Biological Technical Report prepared by Helix Environmental, dated January 19, 2016. The site supports seven sensitive habitat types: Engelmann oak woodland, coast live oak woodland, baccharis scrub, Diegan coastal sage scrub, non-native grassland, southern coast live oak riparian forest, and southern willow scrub. Non-sensitive habitat types or land uses on the site include eucalyptus woodland, non-native vegetation, disturbed habitat, and developed land. Sensitive wildlife species identified on site were Cooper's hawk (*Accipiter cooperi*), turkey vulture (*Cathartes aura*), and western bluebird (*Sialia Mexicana*) and the black-tailed jackrabbit (*Lepus californicus bennetti*), is presumed to occupy the site. Protocol surveys for Quino checkerspot butterfly, Hermes copper butterfly, burrowing owl, and California gnatcatcher were all negative; however, the project site supports potential Hermes copper habitat. Sensitive plant species identified onsite were Engelmann oak (*Quercus engelmannii*), San Diego sunflower (*Bahiopsis laciniata*), and southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*), all three of which are List D sensitive species. The site is located within the MSCP, but is not designated as a Pre-approved Mitigation Area (PAMA) and does not qualify as a Biological Resource Core Area (BRCA), as discussed in the Biological Technical Report section 1.5.3 and the MSCP Findings dated November 3, 2015.

The project would have a significant impact on 140.2 acres of raptor foraging habitat (90.1 acres of coastal sage scrub and 50.1 acres of non-native grassland). Clearing and grading during the California gnatcatcher breeding season could have potential impacts on nesting California gnatcatcher in the unlikely event that the site becomes occupied, and clearing and grading during the bird breeding season could impact migratory birds or raptors. The project would also impact 10 Engelmann oak trees, 215 San Diego sunflower plants, and one spiny rush plant, as well as potential habitat for six Group 2 sensitive animal species (coast patch-nosed snake, coastal rosy boa, coastal western whiptail, Coronado skink, northern red-diamond rattlesnake, and orange-throated whiptail); however, these impacts are considered less than significant because these species are widespread within the San Diego National Wildlife Refuge and elsewhere, and the project's impacts would not threaten these species' regional survival. The project would impact potential habitat for three Group 1 sensitive animal species (grasshopper sparrow, red-shouldered hawk, and rufous-crowned sparrow) but because avian species are able to disperse from the impact area, the impact would not be significant.

As considered by the GPU EIR, project impacts to raptor foraging habitat and potential breeding season impacts will be mitigated through implementation of the following mitigation measures: off-site preservation of 90.1 acres of coastal sage scrub or Tier II habitat, and 25.1 acres of non-native grassland habitat or Tier III habitat within an

approved mitigation bank or BRCA in the South County MSCP and breeding season avoidance to prevent brushing, clearing, and/or grading between March 1 and August 15 for California gnatcatcher, between January 15 and July 15 for raptors, and between February 15 and August 31 for migratory birds. Because the project will impact potential Hermes copper butterfly habitat, the coastal sage scrub mitigation site should also support potential Hermes copper butterfly habitat. The GPU EIR identified these mitigation measures as Bio 1.5 and 1.6.

- 4(b) Based on the Biological Resources report, the project will impact 90.1 acres of Diegan coastal sage scrub, 4.9 acres of baccharis scrub, 50.1 acres of non-native grassland, 0.1 acre of Engelmann oak woodland, 0.1 acre of coast live oak woodland, and 0.14 acre of southern coast live oak riparian forest. Impacts to wetlands/jurisdictional waters consist of 0.16 acre (3,702 linear feet) of non-wetland Waters of the U.S., 0.24 acre (3,702 linear feet) of CDFW jurisdictional streambed, and 0.14 acre of CDFW- and RPO-jurisdictional Southern Coast Live Oak Riparian Forest (SCLORF).

As considered by the GPU EIR, project impacts to sensitive habitats will be mitigated through ordinance compliance and through implementation of the following mitigation measures: off-site preservation of 95 acres of coastal sage scrub or Tier II habitat, 25.1 acres of non-native grassland or Tier III habitat, 0.1 acre of Engelmann oak woodland or Tier I habitat, 0.1 acre of coast live oak woodland or Tier I habitat, 0.14 acre of acres of SCLORF creation and 0.28 acres of SCLORF restoration/enhancement, all located within an approved mitigation bank or BRCA in the MSCP. Impacts to CDFW jurisdictional streambed shall be mitigated at a 1:1 ratio through purchase of 0.24 acre of mitigation credits through consultation with the CDFW on a Streambed Alteration Agreement prior to Final Map recordation or issuance of grading permit. Mitigation for Project impacts to non-wetland WUS shall occur at a 1:1 ratio in consultation with USACE pursuant to issuance of a permit to place fill in WUS. The Project shall obtain a USACE permit under Section 404 of the Clean Water Act and Section 401 Water Quality Certification prior to Final Map recordation or issuance of a grading permit.

- 4(c) The proposed project site does not contain any wetlands as defined by Section 404 of the Clean Water Act, therefore, no impacts will occur.
- 4(d) Based on a GIS analysis, site photos, a site visit by County staff, and the Biological Resources Report, it was determined that the site is not part of a regional linkage/corridor as identified on MSCP maps nor is it in an area considered regionally important for wildlife dispersal. The Project site is in the center of Jamul, which is rural but developed and does not support open space areas contiguous with surrounding undeveloped lands. Therefore, the Project site is an island of undeveloped land surrounded by rural development and does not provide linkage or wildlife movement corridors between adjacent open space areas. Wildlife movement is expected to occur between undeveloped blocks of habitat located further to the north within the expansive open space surrounding McGinty Mountain; to the south in the expansive open space surrounding Jamul Mountains and Jamul Creek; to the east near Jamul Butte; and to the west out near the Sweetwater River and the San Diego National Wildlife Refuge. Implementation of the proposed Project would not impact local or regional wildlife corridors as the Project site is (1) bounded by SR-94 to the south, Olive Vista Drive to the North, and Jefferson Road to the West, and existing development on all sides; (2) is not adjacent to preserved lands; and (3) the small tributary drainage in the northwest corner of the Project site provides no off site connection for local corridor movement. As such, the Project site does not contain biological resources that are critical for sensitive

species within the Plan Area, and, therefore, does not comprise a substantial wildlife movement corridor.

- 4(e) The project is consistent with the MSCP, Biological Mitigation Ordinance, and Resource Protection Ordinance (RPO) because off-site mitigation will be required to compensate for the loss of significant habitat.

Conclusion

The project could result in potentially significant impacts to biological resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
5. Cultural Resources – Would the Project:			
a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Directly or indirectly destroy a unique paleontological resource or site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 5(a) Based on an analysis of records and a survey of the property by County approved historian, Steve Van Wormer, it has been determined that the onsite 1891 structure (P-37-018378) is historically significant (CEQA & RPO). The project is designed to avoid this resource; therefore, impacts would be less than significant. The house is a highly visible landmark of the Jamul community; therefore its' visibility is a contributing factor to its significance. The applicant proposes to relocate the house within the commercial parcel. The project is conditioned to relocate the house in an area of the parcel that will retain its visual prominence. As such, impacts would be less than significant. The project is conditioned with the monitoring of the Barrett House during relocation, and the

dedication of a Use, Repair and Maintenance Easement over the house to ensure that any work to the exterior complies with the Secretary of Interior's Standards.

The results of the survey and evaluation are provided in a cultural resources report titled, *Simpson Farm Property History* (March 2015) prepared by Stephen Van Wormer and Susan Walter (Appendix B of the cultural study).

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-1.1 and CUL-1.6.

- 5(b) One archaeological site was identified on the property during the archaeological survey. The site (CA-SDI-21108) was evaluated and determined not significant. As such, impacts to this site would not be significant.

The Native American Heritage Commission (NAHC) was contacted for a listing of Native American Tribes whose ancestral lands may be impacted by the project. Nineteen tribal contacts were identified by the NAHC as groups that should be contacted. Letters were sent to the 19 tribal contacts. Viejas responded requesting that Viejas cultural monitors be considered for the Archaeological Monitoring Program. The Jamul Indian Village also responded requesting that sites be preserved as much as possible. Preservation in place is not feasible; therefore, the project is conditioned with the relocation of the bedrock features (portions of the slabs), if feasible. Regional coordination and consultation is identified in the GPU EIR as mitigation measures CUL-2.2, CUL-2.4, and CUL-2.6.

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through compliance with the Grading Ordinance and through conformance with the County's Cultural Resource Guidelines if resources are encountered. In addition, the project will be conditioned with (1) a pre-survey of the project site; (2) relocation of the bedrock milling feature, if feasible; and (3) archaeological monitoring (Cul-2.5) that includes the following requirements:

- Pre-Construction
 - Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements.
 - Conduct a pre-survey of the project site to determine whether additional cultural resources are present. The pre-survey shall be conducted by the Project Archaeologist and the Native American monitor.
- Construction
 - Monitoring. Both the Project Archaeologist and Kumeyaay Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor. Monitoring of previously disturbed soils will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor.
 - If cultural resources are identified:

- Both the Project Archaeologist and Kumeyaay Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
 - The Project Archaeologist shall contact the County Archaeologist.
 - The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American shall determine the significance of discovered resources.
 - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
 - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
 - If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).
- Human Remains.
 - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
 - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin.
 - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
 - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
 - Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
- Rough Grading
 - Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered.
- Final Grading
 - A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered.

- Disposition of Cultural Material.
 - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or Tribal curation facility that meets federal standards per 36 CFR Part 79.
 - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

5(c) The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

5(d) A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on Cretaceous Plutonic formations that have no potential to contain unique paleontological resources. As such, no mitigation is required.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: conformance with the County's Paleontological Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1.

5(e) Based on an analysis of records and archaeological surveys of the property, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains.

Conclusion

The project could result in potentially significant impacts to cultural resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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6. Geology and Soils – Would the Project:

a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, and/or landslides?

☐
☐
☐

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| b) Result in substantial soil erosion or the loss of topsoil? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

- 6(a)(i) The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault.
- 6(a)(ii) To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. Compliance with the California Building Code and the County Building Code will ensure that the project will not result in a significant impact.
- 6(a)(iii) The project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. In addition, the site is not underlain by poor artificial fill or located within a floodplain.
- 6(a)(iv) The site is not located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards.
- 6(b) According to the Soil Survey of San Diego County, the soils on-site are identified as Fallbrook sandy loam (5%-9%, 9%-15% and 15%-30% slopes), Fallbrook rocky sandy loam (9%-30% slopes) and Ramona sandy loam (5-9% slopes), which have a soil erodibility rating of Severe. However, the project will not result in substantial soil erosion or the loss of topsoil because the project will be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which will ensure that the project would not result in any unprotected erodible soils, will not alter existing drainage patterns, and will not develop steep slopes. Additionally, the project will be required to implement Best Management Practices (BMPs) to prevent fugitive sediment.
- 6(c) The project is not located on or near geological formations that are unstable or would potentially become unstable as a result of the project.
- 6(d) The project is underlain by Fallbrook sandy loam (5%-9%, 9%-15% and 15%-30% slopes), Fallbrook rocky sandy loam (9%-30% slopes) and Ramona sandy loam (5-9% slopes), which is considered to be a moderately expansive soil, indicating a potential for expansion. However, the project will not result in a significant impact because

compliance with the Building Code and implementation of standard engineering techniques will ensure structural safety.

- 6(e) The project will rely on public water, however, alternative septic systems would be proposed for each lot. Regardless, the project has been evaluated and determined acceptable for the use of alternative septic systems.

Conclusion

As discussed above, the project would not result in any significant impacts to/from geology/soils; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
7. Greenhouse Gas Emissions – Would the Project:			
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 7(a) A Greenhouse Gas (GHG) Analysis Report was conducted for the proposed project and is included in the attached technical studies. The analysis was conducted according to San Diego County Recommended Content and Format for Climate Change Analysis Reports in Support of CEQA Documents (2016).

The proposed project would consist of 95 single family homes, open space, access roads, and drainage facilities. The project would generate GHG emissions from construction activities, operational vehicle trips, and indirect emissions from waste generation and electricity demand associated with land use development.

Based on the emissions modeling conducted, the project's estimated total GHG emissions would be 1,491 metric tons of carbon dioxide equivalents per year (CO₂E/year). Based on SANDAG forecast data for the project's census tract, the project would serve up to 306 residents. Thus, in accordance with San Diego County guidance, the project would not exceed the recommended efficiency annual threshold of 4.9 MT CO₂E per service population (i.e., total project annual emissions of 1,491 MT CO₂E divided by the estimated service population of 306 would be 4.87 metric tons of CO₂E).

Further, as described in the GHG Analysis Report and in the Conditions of Approval for the project, numerous design measures would be required that would reduce GHG emissions. These include installation of solar panels to provide 60 percent of residential electricity demand, solar water heaters to provide at least 19 percent of overall water heating, water conservation measures to reduce water consumption by 20 percent, and solid waste reduction measures. Full details and explanation is provided in the GHG Analysis Report and Conditions of Approval for the project.

The project would not exceed applicable significance criteria and would include numerous design features that would reduce GHG emissions. As such, the project would not result in a considerable contribution to global climate change. This impact would be less than significant.

- 7(b) As described above, the project would not result in a cumulatively considerable contribution to global climate change. As such, the project would be consistent with County goals and policies included in the County General Plan that address greenhouse gas reductions. Therefore, the project would be consistent with emissions reduction targets of Assembly Bill 32, the Global Warming Solutions Act. Thus, the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gas emissions.

Conclusion

As discussed above, the project would not result in any significant impacts to greenhouse gas emissions; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
8. Hazards and Hazardous Materials – Would the Project:			
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? ☐ ☐ ☐

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? ☐ ☐ ☐

h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances? ☐ ☐ ☐

Discussion

8(a) The applicant proposes a residential subdivision. It will not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. Land use on the 162 acre Simpson Farms property historically consisted of agricultural uses since at least 1968. The Phase I Environmental Site Assessment was completed for the subject property to determine the extent, if any, of hazardous materials contamination onsite as a result of the historic agricultural uses. The Phase I ESA findings concluded that there is no human health exposure concern on the subject property.

In addition, the project does not propose to demolish any existing structures onsite which could produce a hazard related to the release of asbestos, lead based paint or other hazardous materials. The existing farm house on the commercial portion of the property is proposed to be relocated. However, development within the commercial portion of the property would require an approved Major Use Permit. Therefore, the applicant would be required to evaluate this portion of the property during the Major Use Permit process.

8(b) Although the project is located within one-quarter mile of an existing school, the project does not propose the handling, storage, or transport of hazardous materials. Therefore, the project will not have any effect on an existing or proposed school.

8(c) A Phase I Environmental Site Assessment was conducted by Rincon Consultants, dated May 6, 2014, to identify the presence of hazardous substances or petroleum products in the soil, groundwater or surface water related to the existing or historic use. The Phase I consisted of site reconnaissance, a description of the historical site conditions, an interview with property owner, a review of records and a summary report. The records search did not show the property listed in any hazardous materials databases. The Phase I concluded that there is no evidence of existing or historic contamination on or adjacent to the site.

8(d) The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose construction of any structure

equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport.

- 8(e) The proposed project is not within one mile of a private airstrip.
- 8(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN: The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.
- 8(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN: The property is not within the San Onofre emergency planning zone.
- 8(f)(iii) OIL SPILL CONTINGENCY ELEMENT: The project is not located along the coastal zone.
- 8(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN: The project would not alter major water or energy supply infrastructure which could interfere with the plan.
- 8f)(v) DAM EVACUATION PLAN: The project is not located within a dam inundation zone.
- 6(g) The proposed project is adjacent to wildlands that have the potential to support wildland fires. However, the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project will comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code, as described in the approved Fire Protection Plan (FPP) prepared for the project by Hunt Research Corporation, (April 2015). Also, a Fire Service Availability Letter dated April 14, 2015 has been received from the San Diego Rural Fire Protection District which indicates the expected emergency travel time to the project site to be approximately 5 minutes. The FPP notes that the travel time is approximately 3minutes. The County Fire Marshal reviewed both the Fire Service Availability Letter and FPP and determined the response time to be approximately 4 minutes. In all reviews, the travel time either meets or is within the maximum travel time, which is 5 minutes, as allowed by the County Public Facilities Element.
- 6(h) The project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Moreover, based on a site visit conducted by County staff, there are none of these uses on adjacent properties.

Conclusion

As discussed above, the project would not result in any significant impacts to/from hazards/hazardous materials; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
9. Hydrology and Water Quality – Would the Project:			
a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k) Expose people or structures to a significant risk of loss, injury or death involving flooding?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam? ☐ ☐ ☐
- m) Inundation by seiche, tsunami, or mudflow? ☐ ☐ ☐

Discussion

- 9(a) The project will require a NPDES General Permit for Discharges of Storm Water Associated with Construction Activities. The project applicant has provided a Stormwater Management Plan (SWMP) which demonstrates that the project will comply with all requirements of the WPO. The project will be required to implement site design measures, source control BMPs, and/or treatment control BMPs to reduce potential pollutants to the maximum extent practicable. These measures will enable the project to meet waste discharge requirements as required by the San Diego Municipal Permit, as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP).
- 9(b) The project lies in the Jamacha (909.21) hydrologic subarea, within the Sweetwater hydrologic unit and the Jamul (910.33) hydrologic subarea, within the Otay hydrologic unit. There are no impaired water bodies according to the Clean Water Act Section 303(d) list. The project will comply with the WPO and implement site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters.
- 9(c) As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances will ensure that project impacts are less than significant.
- 9(d) The project is a grading plan for temporary grading operations. The project will not use any groundwater as it relates to grading activities. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.
- 9(e) As outlined in the project's SWMP, the project will implement source control and/or treatment control BMP's to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff.
- 9(f) The project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons: based on a Drainage Study prepared by Project Design Consultants on January 14, 2016, drainage will be conveyed to either natural drainage channels or approved drainage facilities.
- 9(g) The project does not propose to create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.
- 9(h) The project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs will be employed such that potential pollutants will be reduced to the maximum extent practicable.
- 9(i) No housing will be placed within a FEMA mapped floodplain or County-mapped floodplain or drainage with a watershed greater than 25 acres.

- 9(j) No 100-year flood hazard areas were identified on the project site or offsite improvement locations.
- 9(k) The project site lies outside any identified special flood hazard area.
- 9(l) The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately downstream of a minor dam that could potentially flood the property.
- 9(m)(i) SEICHE: The project site is not located along the shoreline of a lake or reservoir.
- 9(m)(ii) TSUNAMI: The project site is not located in a tsunami hazard zone.
- 9(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 6(a)(iv).

Conclusion

As discussed above, the project would not result in any significant impacts to/from hydrology/water quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

10. Land Use and Planning – Would the Project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 10(a) The project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area.
- 10(b) The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

Conclusion

As discussed above, the project would not result in any significant impacts to land use/planning; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

11. Mineral Resources – Would the Project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? ☐ ☐ ☐

11(a) The project site has been classified by the California Department of Conservation – Division of Mines and Geology as MRZ-3. However, the project site is surrounded by residential uses, which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, the project will not result in the loss of a known mineral resource because the resource has already been lost due to incompatible land uses.

11(b) The project site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25).

Conclusion

As discussed above, the project would not result in any significant impacts to mineral resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
12. Noise – Would the Project:			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 12(a) The project is a Tentative Map for a residential subdivision. Incorporation of noise barriers screening future traffic along nearby roadways would ensure the project would not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element Tables N-1 and N-2 addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element.

The project is comprised of a Tentative Map subdivision located in the Jamul Dulzura Community Plan area immediately abutting Campo Road/SR-94. The project is subject to the County Noise Element which requires proposed exterior noise sensitive land uses not to exceed the 60 dBA CNEL noise requirement for single family residences. Noise levels from future traffic traveling on Campo Road/SR-94 were evaluated and determined that future traffic noise levels would be as high as 69 dBA CNEL on the ground level elevation of Lots 11, 12, 13, and 14. Additionally, noise barriers would be required would be required to reduce noise levels to 60 dBA CNEL and below at Lot 1 and Lots 11 through 16. Permanent sound barriers ranging from 5 feet to 8 feet high would be located along the entire southern boundaries of Lots 11 through 17 and on Lots 1 and 21 as shown on the Noise Report prepared by Helix. Incorporation of the noise barriers would reduce noise levels to 60 dBA CNEL and below. The entire area of Lots 11 through 16, and Lots 1 and 21 would be dedicated with a Noise Restriction Easement to ensure exterior and interior noise levels pursuant to the County Noise Element are satisfied prior to building permits. Off-site direct and cumulative noise impacts to off-site residences was also evaluated and determined that project related traffic on nearby roadways would not have a direct noise impact of 3 dBA or more and would not have a significant contributions to the cumulative noise in the area. Direct and cumulative noise impacts to off-site existing residences are not anticipated. Therefore, incorporation of an Noise Restriction Easement and noise barriers would ensure the project is not expected to expose existing or planned noise sensitive areas to noise in excess of 60 dB(A).

Noise Ordinance – Section 36-404: Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project's property line. The project does not involve any permanent noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-409: The project is also subject to temporary construction noise as it relates to the County Noise Ordinance, Section 36.409. Grading equipment operations would be spread out over the project site from varying distances in relation to occupied property lines. General grading operations comprised of a dozer and excavator is anticipated to comply with the 75 dBA Leq eight hour requirement at any occupied property lines. However, proposed use of breaker equipment may potentially result in levels exceeding this threshold requirement of 75 dBA. Noise mitigation would be required to establish setback requirements for the operation of the breaker equipment to a minimum distance of 300 feet from the nearest property line of an occupied residence.

This setback distance requirement would demonstrate noise ordinance compliance with the proposed breaker operations. Additionally, proposed blasting operations may result in an exceedance to the County Noise Ordinance and a Blasting Management Plan would be required to ensure all associated blasting activities comply with County noise standards.

- 12(b) The project proposes residences where low ambient vibration is essential for interior operation and/or sleeping conditions. However, the facilities are typically setback more than 50 feet from any County Circulation Element (CE) roadway using rubber-tired vehicles with projected groundborne noise or vibration contours of 38 VdB or less; any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 50 feet from the roadway centerline for heavy-duty truck activities would insure that these proposed uses or operations do not have any chance of being impacted significantly by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995, Rudy Hendriks, Transportation Related Earthborne Vibrations 2002). This setback insures that this project site will not be affected by any future projects that may support sources of groundborne vibration or groundborne noise related to the adjacent roadways.

Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels and impact vibration sensitive uses in the surrounding area.

Therefore, the project will not expose persons to or generate excessive groundborne vibration or groundborne noise levels on a project or cumulative level.

- 12 (c) The project involves the following permanent noise sources that may increase the ambient noise level: Additional vehicular traffic on nearby roadways and activities associated with residential subdivisions. As indicated in the response listed under Section 12(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Off-site direct and cumulative noise impacts to off-site residences was also evaluated and determined that project related traffic on nearby roadways would not have a direct noise impact of 3 dBA or more and would not have a significant contributions to the cumulative noise in the area. Direct and cumulative noise impacts to off-site existing residences are not anticipated. Also, the project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels.

- 12(d) The project is also subject to temporary construction noise as it relates to the County Noise Ordinance, Section 36.409. Grading equipment operations would be spread out over the project site from varying distances in relation to occupied property lines. General grading operations comprised of a dozer and excavator is anticipated to comply with the 75 dBA Leq eight hour requirement at any occupied property lines. However, proposed use of breaker equipment may potentially result in levels exceeding this threshold requirement of 75 dBA. Noise mitigation would be required to establish setback requirements for the operation of the breaker equipment to a minimum distance of 300 feet from the nearest property line of an occupied residence. This setback distance requirement would demonstrate noise ordinance compliance with the proposed breaker operations. Additionally, proposed blasting operations may result in an

exceedance to the County Noise Ordinance and a Blasting Management Plan would be required to ensure all associated blasting activities comply with County noise standards.

12(e) The project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport.

12(f) The project is not located within a one-mile vicinity of a private airstrip.

Conclusion

As discussed above, the project would not result in any significant impacts from noise with the incorporation of a Noise Restriction Easement dedication and noise barriers as recommended within the acoustical analysis. These are considered feasible mitigation measures contained within the GPU EIR that will be applied to the project; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
13. Population and Housing – Would the Project:			
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

13(a) The project will not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area.

13(b) The project will not displace existing housing.

13(c) The proposed project will not displace a substantial number of people since the site is currently vacant.

Conclusion

As discussed above, the project would not result in any significant impacts to populations/housing; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
14. Public Services – Would the Project:			
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

14(a) Based on the project's service availability forms, the project would not result in the need for significantly altered services or facilities.

Conclusion

As discussed above, the project would not result in any significant impacts to public services; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
15. Recreation – Would the Project:			
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

15(a) The project would incrementally increase the use of existing parks and other recreational facilities; however, the project will be required to pay fees or dedicate land for local parks pursuant to the Park Land Dedication Ordinance.

15(b) The project includes trails and/or pathways. Impacts from these amenities have been considered as part of the overall environmental analysis contained elsewhere in this document.

Conclusion

As discussed above, the project would not result in any significant impacts to recreation; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
16. Transportation and Traffic – Would the Project:			
a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 16(a) The project will result in an additional 7,370 ADT. The project will not conflict with any established performance measures. In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities.
- 16(b) A Traffic Impact Study, dated August 25, 2015, prepared by LLG Engineers was completed for the proposed project. The Traffic Impact Study identified that the proposed project would result in an additional 7,370 ADT. Project trips would be distributed to the following CMP designated facilities: SR-94. Direct and/or cumulative impacts were identified to the following CMP roadways: SR-94. The following mitigation measures were identified to reduce impacts to identified CMP facilities to a less than significant level: Traffic Signal at the SR-94 and Lyons Valley Road intersection. Therefore, with the incorporation of the identified mitigation, the project would not conflict with the applicable congestion management program because CMP impacts would be fully mitigated.

- 16(c) The proposed project is located outside of an Airport Influence Area and is not located within two miles of a public or public use airport.
- 16(d) The proposed project will not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road.
- 16(e) The Rural Fire Protection District and the San Diego County Fire Authority have reviewed the project and its Fire Protection Plan and have determined that there is adequate emergency fire access.
- 16(f) The project will not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities.

Conclusion

As discussed above, the project would not result in any significant impacts to transportation/traffic; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
17. Utilities and Service Systems – Would the Project:			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 17(a) The project would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). A project facility availability form has been received from the Otay Water District that indicates that there is adequate capacity to serve the project.
- 17(b) The project involves new water and wastewater pipeline extensions. However, these extensions will not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.
- 17(c) The project involves new storm water drainage facilities. However, these extensions will not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.
- 17(d) A Service Availability Letter from the Otay Water District has been provided which indicates that there is adequate water to serve the project.
- 17(e) The project will use on-site waste water systems. Therefore, no letter is required from a sewer district.
- 17(f) All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the project.
- 17(g) The project will deposit all solid waste at a permitted solid waste facility.

Conclusion

As discussed above, the project would not result in any significant impacts to utilities and service systems; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

Attachments:

Appendix A – References

Appendix B – Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067

Appendix A

The following is a list of project specific technical studies used to support the analysis of each potential environmental effect:

Helix Environmental Planning, Dennis Marcin (January 2016). Agricultural Resources Report.
Helix Environmental Planning, Joanne M. Dramko (May 2015). Air Quality Analysis Report.
Helix Environmental Planning, Jason Kurnow, Laura Moreton, Jenna Hartsook (January 19, 2016). Biological Technical Report.
Helix Environmental Planning, Joanne M. Dramko (August 2016). Greenhouse Gas Analyses Report.
Helix Environmental Planning, Mary Robbins-Wade (July 2015). Cultural Resources Inventory and Assessment.
Project Design Consultants, Debby Reece (January 14, 2016). CEQA Preliminary Hydrology/Drainage Study.
Hunt Research Corporation, James W. Hunt (April 2015). Fire Protection Plan.
Helix Environmental Planning, Charles Terry (May 2015). Acoustical Site Assessment Report.
Project Design Consultants, Debby Reece (January 14, 2016). Preliminary Hydromodification Management Study.
GeoCon, Inc., Jonathan T. Layog and John Hoobs (December 10, 2015) Infiltration Investigation.
Rincon Consultants, Inc., Walt Hamann (May 6, 2014) Phase I Environmental Site Assessment.
Rincon Consultants, Inc., Bart Templeman and Walt Hamann (June 16, 2005) Phase II Environmental Site Assessment.
Project Design Consultants, Debby Reece (July 15, 2016). Priority Development Project (PDP) SWQMP.
Chang Consultants, Wayne W. Chang (April 10, 2014). Hydromodification Screening.
Linscott, Law & Greenspan, KC Yellapu and Charlene Sadiarin (August 25, 2015). Traffic Impact Analysis.
Development Design Services & Graphic Access, Inc., Adam Gevanthor (October 2015). Visual Analysis.

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the General Plan Update Final Certified Program EIR, dated August 3, 2011, please visit the County's website at:

[http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00 -
_References_2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf)

Appendix B

A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:

http://www.sdcountry.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf